



U.S. Department of Justice

Criminal Division

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By Overnight Delivery

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Re: United States v. Roland Kaufmann, Jean-Pierre  
Neuhaus  
Docket No. 12 CR 439 (JG)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government furnishes the following discovery with respect to the above-referenced case. The government also requests reciprocal discovery.

1. Statements of the Defendants

The government is providing separately to each defendant copies of any reports setting forth post-arrest statements made by that defendant.

2. The Defendants' Criminal Histories

The government is providing separately to each defendant the criminal histories for each defendant.

3. Documents and Objects

If applicable, to the extent the government has not already done so, the government will provide to each defendant copies of any items and documents seized from that defendant at the time of his or her arrest.

The government encloses a copy of the Complaint and Affidavit in Support of Arrest Warrants.

To the extent the government searched any defendant's property, the government is providing a copy of the affidavit in support of the relevant search warrant or the form consenting to the search.

If you wish to examine any original items in the government's possession, custody, or control within the scope of Rule 16(a)(1)(C), please call me to arrange to do so.

4. Brady Material

The government is aware of and will comply with its obligation to produce exculpatory material or information within the scope of Brady v. Maryland, 373 U.S. 83 (1963), and its progeny.

The government will also furnish before trial materials discoverable pursuant to Title 18, United States Code, Section 3500.

5. Other Crimes, Wrongs or Acts

The government will provide the defendants with reasonable notice in advance of trial if it intends to offer any material under Fed. R. Evid. 404(b).

The Defendants' Required Disclosures

The government hereby requests reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that each defendant allow inspection and copying of (1) any books, papers, documents, photographs, tapes, tangible objects, or copies or portions thereof, that are in that defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial.

The government also requests that each defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid unnecessary delays, we request that you have copies of these statements available for production to the government no later than the commencement of trial.

Indexes describing generally the materials being produced to both defendants and to each defendant, and their corresponding Bates ranges, are attached to this letter.

If you have any questions or further requests, please do not hesitate to contact me.

Very truly yours,

DENIS J. MCINERNEY  
U.S. DEPARTMENT OF JUSTICE  
CHIEF  
CRIMINAL DIVISION, FRAUD SECTION

By:

  
Justin Goodyear  
Trial Attorney  
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CC: Clerk of the Court (LDW) (by ECF, without enclosures)

7/27/2012

U.S. v. Kaufmann, 12 CR 439**DOCUMENTS PRODUCED TO BOTH DEFENDANTS**

<u>Bates Range</u>	<u>General Description</u>
DOJ-12CR439-00000001 - DOJ-12CR439-00000080	Axius documents
DOJ-12CR439-00000081 - DOJ-12CR439-00000130	Consents to search; affidavits in support of complaint warrant, search warrant
DOJ-12CR439-00000131 - DOJ-12CR439-00000278	Documents and photographs relating to hotel room searches
DOJ-12CR439-00000279 - DOJ-12CR439-00000305	Reports and receipts relating to property seizure and return, arrest, and prisoner intake
DOJ-12CR439-00000306	Documents and photographs relating to hotel room searches
DOJ-12CR439-00000307 - DOJ-12CR439-00000353	Website printouts and downloads
DOJ-12CR439-00000354 - DOJ-12CR439-00000360	Reports and receipts relating to property seizure and return, arrest, and prisoner intake